

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: December 12, 2024 at 1:00 p.m. ET

**NOTICE OF DEBTORS' EXHIBIT LIST AND INTENT TO OFFER  
WITNESS TESTIMONY AT THE HEARING ON DECEMBER 12, 2024 REGARDING  
THE MOTION OF THE JOINT LIQUIDATORS OF THREE ARROWS CAPITAL,  
LTD. (IN LIQUIDATION) FOR LEAVE TO AMEND PROOF OF CLAIM**

**PLEASE TAKE NOTICE** that FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) hereby provide the following information regarding the witnesses that they intend to present, and the list of the potential exhibits that they may seek to introduce, at the hearing scheduled on December 12, 2024 (the “Hearing”) regarding the *Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim* [D.I. 27755] (the “Motion”) and the *Debtors’ Objection to the Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim* [28587] (the “Objection”).

**INFORMATION ON WITNESS BENJAMIN S. BELLER**

1. Mr. Beller is Partner at Sullivan & Cromwell LLP, counsel to the Debtors.
2. Mr. Beller will be attending the Hearing and available to testify in person. The content of Mr. Beller’s direct testimony is set forth in the *Declaration of Benjamin S. Beller in Support of Debtors’ Objection to Motion of the Joint Liquidators of Three*

---

<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

*Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim* [D.I. 28588] (the “Beller Declaration”). The Debtors may elicit additional direct or rebuttal testimony from Mr. Beller at the Hearing.

3. The Debtors do not anticipate that any party will request to cross examine the witness.

### **INFORMATION ON WITNESS NICHOLAS SHAY**

1. Mr. Shay is a Software Engineer at FTX Trading Ltd.
2. Mr. Shay will be attending the Hearing and available to testify in person. The content of Mr. Shay’s direct testimony is set forth in the *Declaration of Nicholas Shay* [D.I. 28589] (the “Shay Declaration”). The Debtors may elicit additional direct or rebuttal testimony from Mr. Shay at the Hearing.

### **EXHIBITS**

In connection with the Hearing, the Debtors may seek to use any one or more of the following documents:

<b>Ex. #</b>	<b>Description</b>
1.	<i>Declaration of Benjamin S. Beller in Support of Debtors’ Objection to Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim</i> [D.I. 28588]
2.	Data related to 3AC’s Line of Credit [D.I. 28588, Ex. A]
3.	July 1, 2022 letter from the Joint Liquidators to FTX [D.I. 28588, Ex. B]
4.	July 7, 2022 email from Karthik Bhavaraju [D.I. 28588, Ex. C]
5.	July 14, 2022 email from Ashley Bethel [D.I. 28588, Ex. D]
6.	July 19, 2022 email from Christopher Farmer [D.I. 28588, Ex. E]
7.	September 27, 2022 email from Ashley Bethel [D.I. 28588, Ex. F]
8.	October 20, 2022 email from Christian Fay [D.I. 28588, Ex. G]
9.	November 10, 2022 email from Christian Fay [D.I. 28588, Ex. H]
10.	December 9, 2022 Twitter post by Kyle Davies [D.I. 28588, Ex. I]

Ex. #	Description
11.	May 2022 NAV Pack [D.I. 28588, Ex. J] <sup>2</sup>
12.	FTX Features Overview webpage [D.I. 28588, Ex. K]
13.	OTC Guide webpage [D.I. 28588, Ex. L]
14.	API Documentation webpage [D.I. 28588, Ex. M]
15.	Historical Data webpage [D.I. 28588, Ex. N]
16.	Original Proof of Claim [D.I. 28588, Ex. O]
17.	Transcript of Crumpler Deposition [D.I. 28588, Ex. P]
18.	April 5, 2024 email from Joint Liquidators' counsel [D.I. 28588, Ex. Q]
19.	<i>Declaration of Nicholas Shay</i> [D.I. 28589]
20.	October 25, 2023 Alvarez & Marsal Presentation
21.	September 4, 2024 Alvarez & Marsal Presentation
22.	Any rebuttal or impeachment exhibits

### **RESERVATION OF RIGHTS**

The Debtors reserve all rights to: (i) amend and supplement this exhibit and witness list at any time at or prior to the Hearing; (ii) use additional exhibits for purposes of rebuttal or impeachment and to supplement the foregoing exhibit list as appropriate; (iii) rely upon and use as evidence (a) any exhibits included on the exhibit lists of any other party in interest and (b) any pleading, hearing transcript, order, or other document filed with the Court in these Chapter 11 Cases or any adversary proceeding; (iv) cross examine any and all witnesses proffered at the Hearing; and (v) call any rebuttal witnesses as the Debtors may deem necessary at the Hearing.

---

<sup>2</sup> The May 2022 NAV Pack may be used at the Hearing in PDF and/or native Excel format.

Dated: December 10, 2024  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
brown@lrclaw.com  
pierce@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Andrew G. Dietderich (admitted *pro hac vice*)  
James L. Bromley (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Benjamin S. Beller (admitted *pro hac vice*)  
125 Broad Street  
New York, New York 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: dietdericha@sullcrom.com  
bromleyj@sullcrom.com  
gluecksteinb@sullcrom.com  
bellerb@sullcrom.com

*Counsel for the Debtors and Debtors-in-Possession*